

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SHAWN S. LEHAL,

Plaintiff,

-against-

CENTRAL FALLS DETENTION FACILITY
CORPORATION, EDWARD BLANCHETTE, M.D.,
JAMES MASTERSON, ROBERT MARTIN and ERIC
KING,

Defendants.

X

: Docket No. 13-CV-3923 (DCF)

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: **DECLARATION OF
BONNIE WHITE**

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X

BONNIE WHITE, hereby declares, under penalty of perjury and pursuant to 28 U.S.C.
§1746, as follows:

1. I am the Health Services Administrator at the Wyatt Detention Center, operated
by the Central Falls Detention Facility Corporation ("CFDFC"). I have been employed in that
position since September 2005. I have personal knowledge of the facts set forth below.

2. I have reviewed certain exhibits which are annexed to the declaration of Lalit K.
Loomba, Esq., submitted in support of CFDFC's motion for summary judgment. These records
are: Exhibit K (medical progress note); Exhibit L (medical progress notes); Exhibit M (offsite
healthcare request and report); Exhibit Q (medical consultation request); Exhibit R (medical
progress note); Exhibit S (medical progress note); Exhibit T (medical consultation request);
Exhibit U (MRI screening form); Exhibit V (MRI report); Exhibit W (medical consultation
request); Exhibit X (MRI report); Exhibit Y (medical progress note); and Exhibit AA (medical
progress note).

3. Each of the above exhibits are true and correct copies of records created (or received) and maintained in the ordinary course of business of CFDFC, and creating (or receiving) and maintaining such records is a regular practice of CFDFC. The documents were created or received at or near the time of the medical observations or treatment reflected in the records.

I declare that the foregoing is true and correct. Executed this 29 of March 2018.



Bonnie White